

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**ALLAN HIVELY, KENNETH KNAUFF and
RANDLE SHAW, JR., individually and on
behalf of all persons similarly situated,**

Plaintiffs,

v.

**ARCHER LIMITED, ALLIS-CHALMERS
ENERGY, INC., AIRCOMP, LLC, and
ARCHER UNDERBALANCED SERVICES,
LLC,**

Defendants.

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: Civil Action No: 2:13-cv-00106-NBF
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: Judge Nora Barry Fischer
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: ELECTRONICALLY FILED
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MOTION FOR ADMISSION *PRO HAC VICE*

Now COME Plaintiffs Allen Hively, Kenneth Knauff, and Randle Shaw, Jr., by their counsel Shanon J. Carson and Sarah R. Schalman-Bergen, members in good standing of the Bar of the United States District Court for the Western District of Pennsylvania and attorneys with Berger & Montague, P.C., who hereby move this Honorable Court to admit Isabel M. Daniels, *pro hac vice*, for purposes of the above-captioned action. In support of this Motion, undersigned counsel states as follows:

1. Isabel M. Daniels is an associate at the law firm of Berger & Montague, P.C., located at 1622 Locust Street, Philadelphia, Pennsylvania, 19103.
2. Ms. Daniels received her Juris Doctor from the University of Michigan Law School in 2009. She is licensed to practice in, and is a member in good standing of the bars of, the State of California and the Commonwealth of Pennsylvania.

3. Ms. Daniels has never been subject to any discipline by any court, jurisdiction, or state. Ms. Daniels also certifies that there are no disciplinary proceedings currently pending against her in any jurisdiction.

4. Ms. Daniels has read and understands the Local Rules and has stated that she will comply with the Federal Rules of Civil Procedure and the applicable Local Rules.

5. Ms. Daniels certifies that she is a registered user of the Electronic Case Filing system in the United States District Court for the Western District of Pennsylvania.

6. Attached hereto as Exhibit A in support of this Motion is an Affidavit of Attorney Isabel M. Daniels.

7. A proposed Order is attached.

WHEREFORE, the undersigned, a member in good standing of the bar of this Court, respectfully moves this Court to enter an Order admitting Isabel M. Daniels to the bar of this Court, *pro hac vice*.

Dated: March 1, 2013

Respectfully submitted,

BERGER & MONTAGUE, P.C.

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